

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

**NEW ENGLAND PROPERTY
SERVICES GROUP, LLC**

Plaintiff,

v.

C.A. No. 2025-

**TRAVELERS HOME AND MARINE
INSURANCE COMPANY**

Defendant.

NOTICE OF REMOVAL

Now comes the defendant, Travelers Home and Marine Insurance Company (misnamed) (“Travelers”),¹ and hereby gives notice of the removal of this action from the Providence County Superior Court of the State of Rhode Island, where it is now pending and styled as *New England Property Services Group, LLC v. Travelers Home and Marine Insurance Company*, C.A. No. PC-2025-02635, to the United States District Court for the District of Rhode Island, pursuant to 28 USC § 1441 *et. seq.* In support of this petition, defendant Travelers avers as follows:

1. Plaintiff New England Property Services Group LLC commenced this action against defendant Travelers in the Providence County Superior Court of the State of Rhode Island on or about May 20, 2025. *Plaintiff’s Complaint*, attached hereto as Exhibit A.²
2. Plaintiff served defendant Travelers with the Complaint through service upon the Rhode Island Insurance Commissioner on or about June 6, 2025. *Summons*, attached hereto as Exhibit B.
3. The District Courts of the United States have original jurisdiction over civil actions where the parties are from diverse states and the matter in controversy exceeds the sum or value

¹ The proper name of this company is *The Travelers Home and Marine Insurance Company*. It is misnamed in the state filing from which this removal is sought.

² Although the Complaint references multiple exhibits, no such exhibits were included with the State Court filing.

of \$75,000, exclusive of interest and costs. 28 USC § 1332(a)(1), 1441(a). Removal of this action is not prohibited by 28 U.S.C. § 1445.

4. With respect to diversity, the plaintiff is a foreign corporation organized and existing under the laws of the Commonwealth of Massachusetts, with its principal place of business in Fall River, Massachusetts. Exhibit A, ¶ 1; *Plaintiff's Business Entity Summary*, attached hereto as Exhibit C.

5. Defendant Travelers is a foreign corporation organized and existing under the laws of the State of Connecticut with its principal place of business in Hartford, Connecticut. *Travelers' Business Entity Summary*, attached hereto as Exhibit D.

6. Because the plaintiff is a corporation of the Commonwealth of Massachusetts and the defendant Travelers is a corporation of the State of Connecticut, complete diversity of jurisdiction exists.

7. The amount in controversy exceeds \$75,000, based on the allegations in the plaintiff's complaint. See Exhibit A, ¶ 41; "Sworn Statement in Proof of Loss," attached hereto as Exhibit E.³

8. Accordingly, the United States District Court for the District of Rhode Island has original jurisdiction over this action pursuant to 28 USC §1332(a) and this action is, therefore, removable to this Court pursuant to 28 USC § 1441.

9. Pursuant to 28 USC § 1446(b), this notice is filed within thirty (30) days of plaintiff's service of its complaint on defendant Travelers.

³ Although the plaintiff failed to actually attach the exhibit referenced in Paragraph 41 of its Complaint, Travelers assumes it was meant to be the document attached hereto as *Exhibit E*.

10. Pursuant to 28 USC § 1446(d), a copy of this Petition for Removal is being filed with the Clerk of Providence County Superior Court for the State of Rhode Island and is being served on plaintiff.

11. Pursuant to Local Rule 81(a), defendant Travelers has requested that the Clerk of the Providence County Superior Court of the State of Rhode Island assemble and provide electronic certified copies of the docket sheet and of all records filed in the State Court action being removed.

WHEREFORE, defendant Travelers hereby Requests that this action now pending against it in the Providence County Superior Court of the State of Rhode Island be removed from that Court to the United States District Court for the District of Rhode Island.

Respectfully submitted,

Travelers Home and Marine Insurance
Company (misnamed),

By Its Attorneys,

/s/ Jessica M. Savino, Esq.

Jessica M. Savino, # 10403
jsavino@morrisontmahoney.com
MORRISON MAHONEY LLP
250 Summer Street
Boston, MA 02210
Tel: 617-439-7525
Fax: 617-342-4928

CERTIFICATION

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 16, 2025.

Counsel for plaintiff:

Nicholas G. Elias, #10775
nicholas@newenglandpropertyservicesgroup.com
New England Property Services Group LLC
1822 North Main Street
Second Floor Annex, Suite 001
Fall River, MA 02720

Also sent via U.S. First Class Mail to:

Clerk of the Court
Providence County Superior Court
Licht Judicial Complex
250 Benefit Street
Providence, RI 02903

/s/ Jessica M. Savino, Esq.